

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Latasha Williams, on Behalf of her Child Jane Doe,	:	CASE NO. 1:21-cv-02304
	:	
	:	Judge Pamela A. Barker
Plaintiff,	:	
	:	Magistrate Judge Darrell A. Clay
-vs-	:	
	:	
	:	<b><u>PLAINTIFF'S UNOPPOSED</u></b>
	:	<b><u>MOTION FOR A 90-DAY</u></b>
	:	<b><u>EXTENSION OF TIME TO FILE AN</u></b>
Lorain City School District Board of Education, et al.,	:	<b><u>ENTRY OF DISMISSAL</u></b>
	:	
	:	
Defendants.	:	

Plaintiff, Latasha Williams, on behalf of her child, Jane Doe, moves this court for ninety (90) additional days, until February 4, 2023, to file an entry of dismissal in this matter. As this matter involved a minor child, any settlement must be approved by the probate court within which the minor resides. Plaintiff has already sent in the documents for filing in the Lorain County Probate Court and is awaiting a hearing date.

The Parties are currently working on finalizing settlement documentation so that a dismissal entry can be submitted upon the approval of the Lorain County Probate Court. Defendants counsel have each indicated that they do not oppose this motion.

Respectfully submitted,

*s/Jared S. Klebanow*

JARED S. KLEBANOW (0092018)  
Klebanow Law, LLC  
701 The City Club Building  
850 Euclid Avenue  
Cleveland, Ohio 44114  
P: (216) 621-8230  
jklebanow@klebanowlaw.com

*s/Avery Friedman*

AVERY FRIEDMAN (0006103)  
Avery Friedman & Associates  
701 The City Club Building  
850 Euclid Avenue  
Cleveland, Ohio 44114  
P: (216) 621-9282  
F: (216) 621-9283  
avery@lawfriedman

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I, Jared Klebanow, one of the attorneys for the Plaintiff, hereby certify that the foregoing PLAINTIFF'S UNOPPOSED MOTION FOR 90-DAY EXTENSION OF TIME TO FILE AN ENTRY OF DISMISSAL was served on counsel of record by the court's electronic filing system on this 18<sup>th</sup> day of October 2022.

*s/ Jared S. Klebanow*

Jared S. Klebanow